

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

LECLAIRRYAN PLLC,

Debtor.¹

Chapter 11

Case No. 19-34574 (KRH)

NOTICE OF MOTION AND NOTICE OF HEARING

PLEASE TAKE NOTICE that on September 12, 2019, LeClairRyan PLLC, the above-captioned debtor and debtor-in-possession (“LeClairRyan” or the “Debtor”), filed the following with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “Court”):

- (i) *Application of LeClairRyan PLLC for Entry of an Order Authorizing the Employment and Retention of Hunton Andrews Kurth LLP as Counsel for LeClairRyan PLLC Effective as of the Petition Date* (the “Hunton Retention Application”);
- (ii) *Application of LeClairRyan PLLC for Entry of an Order Authorizing the Employment and Retention of Protiviti Inc. as Financial Advisor for LeClairRyan PLLC Effective as of the Petition Date* (the “Protiviti Retention Application”);
- (iii) *Motion of LeClairRyan PLLC for Entry of an Order Appointing American Legal Claim Services, LLC as Claims, Noticing, and Balloting Agent* (the “ALCS Appointment Motion”);
- (iv) *Second Omnibus Motion for Entry of an Order Authorizing LeClairRyan PLLC to (I) Reject Unexpired Leases and (II) Abandon Certain Property in Conjunction*

¹ The last four digits of the Debtor’s federal tax identification number are 2451.

HUNTON ANDREWS KURTH LLP
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*Proposed Counsel to the Debtor
and Debtor in Possession*

with Such Rejection (the “Second Lease Rejection Motion”)

- (v) *Motion of LeClairRyan PLLC for Approval of Client File Disposition Procedures* (the “Client File Disposition Motion”); and
- (vi) *Motion for Entry of an Order Authorizing and Directing Payment of Client Expense Reimbursements* (the “Expense Motion”; and collectively, with the Hunton Retention Application, the Protiviti Retention Application, the ALCS Appointment Motion the Second Lease Rejection Motion, and the Client File Disposition Motion, the “Motions”)

PLEASE TAKE FURTHER NOTICE that a copy of the Motions may be obtained at no charge at <https://www.americanlegal.com/leclairryan> or for a fee at <https://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motions carefully and discuss them with your attorney, if you have one in the chapter 11 cases. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE on September 4, 2019, the Court entered the *Order Establishing Certain Notice, Case Management and Administrative Procedures* [ECF. No. 38] (the “Case Management Order”), which approved the Notice, Case Management and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “Case Management Procedures”). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained at no charge at <https://www.americanlegal.com/leclairryan> or for a fee at <https://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE if you do not want the Court to grant the relief requested in the Motions, or if you want the Court to consider your views on the Motions, then, by **September 23, 2019** (the “Objection Deadline”), you or your attorney must:

- ☒ File with the Court, either electronically or at the address shown below, a written response to the Motions pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the Objection Deadline.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motions as conceded and enter an appropriate order granting the requested relief without further notice or hearing.

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street

Suite 4000
Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written Objection on the Core Parties, the 2002 List Parties and any Affected Entity so that the Objection is received on or before the Objection Deadline.

- ☒ Attend a hearing before the Honorable Kevin R. Huennekens, United States Bankruptcy Judge, at 2:00 p.m. (prevailing Eastern Time) on September 26, 2019, at the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, 701 East Broad Street, Room 5000, Richmond, Virginia 23219.

PLEASE TAKE FURTHER NOTICE THAT you should consult the Case Management Procedures before filing any written response.

DATED: September 12, 2019

/s/ Henry P. (Toby) Long, III
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